

# **EXHIBIT 12**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC, )  
Plaintiff, )  
vs. ) Case No.  
UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
Defendants. )

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DANIEL CHU

San Francisco, California

Monday, April 3, 2017

Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2583707

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1 THE WITNESS: So it's -- it's probably a --  
2 a growing -- growing list of folks, but the folks  
3 that we'd probably look at most are -- are Uber in  
4 terms of their self-driving efforts. We also look  
5 at, for instance, Tesla in terms of some of their -- 10:06:20  
6 their efforts there.

7 BY MR. GONZALEZ:

8 Q Would you agree that your number one  
9 competitor in the market is Uber?

10 MS. BAILY: Object to form. 10:06:28

11 THE WITNESS: I think it depends what  
12 you -- [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

16 BY MR. GONZALEZ:

17 Q All right. Let me focus on -- on your  
18 words. I'll use your words.

19 [REDACTED]  
[REDACTED]  
[REDACTED]

22 A Sorry, say again?

23 [REDACTED]  
[REDACTED]  
[REDACTED]

10:06:59

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5 MS. BAILY: Object to form. 10:07:09

6 THE WITNESS: [REDACTED]

8 BY MR. GONZALEZ:

9 Q Would you agree that it's your number one  
10 competitor in that space? 10:07:18

11 MS. BAILY: Object to form.

12 BY MR. GONZALEZ:

13 Q I'm not trying to trap you.

14 A Yeah.

15 Q If somebody else is number one, I want to 10:07:20  
16 know, that's all.

17 A Yeah.

18 Q So let me go back.

19 [REDACTED]  
20 [REDACTED] 10:07:26

21 MS. BAILY: Same objection.

22 THE WITNESS: [REDACTED]

24 BY MR. GONZALEZ:

25 Q And who would you consider to be number 10:07:33

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1 basically my user research team does the surveys.

2 BY MR. GONZALEZ:

3 Q And your research team is to have -- does  
4 it have a name?

5 A They -- they basically just called it the 10:08:38  
6 user research group, yeah.

7 Q User research group?

8 A Yeah.

9 Q Not Daniel's brigade or anything like that?

10 A No. 10:08:49

11 Q All right. [REDACTED]

[REDACTED]

[REDACTED]

14 A I don't remember the exact date.

15 Q Approximately. 10:08:58

16 A But approximately, we've done probably in  
17 the last -- I'm trying to remember -- I mean, last  
18 few months, but it's been more focused on the  
19 markets that we're interested in, yeah.

20 Q And what markets are those that you were 10:09:13  
21 more focused on?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:09:24

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1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

2 MS. BAILY: Object to form.

3 THE WITNESS: [REDACTED]

8 BY MR. GONZALEZ:

9 Q Do you ever have communications with public  
10 agencies about your vehicles? 10:10:51

11 A Do --

12 MS. BAILY: Object to form.

13 THE WITNESS: Do I personally or --

14 BY MR. GONZALEZ:

15 Q Yes, you. 10:10:57

16 A Most of my efforts are more internal  
17 focused.

18 Q Who at Waymo is the person who communicates  
19 with public agencies to try to get approval for you  
20 to be able to drive your autonomous vehicles there? 10:11:08

21 A It's probably going to be more of our  
22 public policy team and our partnership teams.

23 Q And who are the people who are in charge of  
24 those groups?

25 A So -- I'm trying to think. So Kevin Vosen, 10:11:20

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1 San Francisco, if they were going to run through red  
2 lights or whatnot, as -- and -- and that kind of  
3 hurts other players, right. It hurts the perception  
4 of the technology.

5 Q Then the next page, page 12 of the  
6 PowerPoint, it says:

10:23:04

7 [REDACTED]  
8 [REDACTED]  
9 And there's a subheading:

10 [REDACTED]  
11 [REDACTED]  
12 What does that mean?

13 A What it means is if we look at the -- [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

23 And so this is referring to let's assume  
24 they do that. How -- how can we make it so it's --  
25 it's -- it's harder for them to do that.

10:24:02

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1 of billions of dollars?

2 MS. BAILY: Object to form.

3 THE WITNESS: You're saying in general or  
4 you're saying for particular like -- I just want to  
5 make sure I'm answering the question correctly. 10:40:59

6 BY MR. GONZALEZ:

7 Q That's fair.

8 A Yeah.

■ ■ [REDACTED]

10 A Okay. 10:41:04

11 Q Would you agree that the ride-sharing  
12 market for autonomous vehicles is likely to be in  
13 the hundreds of billions of dollars?

14 MS. BAILY: Object to form.

15 THE WITNESS: I think it's -- it's 10:41:17  
16 definitely possible that in the -- in the  
17 ride-sharing market alone for self-driving cars on a  
18 global basis that it will be in the hundreds of  
19 billions of dollars, that's correct.

20 BY MR. GONZALEZ: 10:41:33

21 Q Let me show you a document we've marked as  
22 1033.

23 (Defendant Exhibit 1033 marked by the court  
24 reporter.)

25 BY MR. GONZALEZ: 10:41:39

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